

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Mondaire Jones, Alessandra Biaggi, Chris Burdick, Stephanie Keegan, Seth Rosen, Shannon Spencer, Kathy Rothschild, Diana M. Woody, Perry Sainati, Robert Golub, Mary Winton Green, Marsie Wallach, Matthew Wallach, Mac Wallach, Carol Sussman, and Rebecca Rieckhoff,
individually, and on behalf of all others similarly situated,

Plaintiffs,

v.

United States Postal Service, Louis DeJoy, as Postmaster General of the United States Postal Service, and Donald J. Trump, as President of the United States,

Defendants.

No 20 Civ. 6516 (VM)

DECLARATION OF ROBERT JUSTIN GLASS

I, Robert Justin Glass, under penalty of perjury and in lieu of affidavit as permitted by 28 U.S.C. § 1746, hereby declare as follows:

1. I am currently employed by the United States Postal Service as Manager, Operations Industrial Engineering, at Postal Service Headquarters in Washington, DC. I am currently serving as the Postal Service's Director of Election Season. I have been employed by the Postal Service for 15 years, in which time I have served as an industrial engineer and a Plant Manager, as well as overseeing the Postal Service's participation in the 2020 Census.
2. I am familiar with the above-captioned action. I am familiar with the Postal Service's Election Mail policies and practices, and the Election Mail-related actions the Postal Service has taken to facilitate the 2020 election. This declaration is based on my personal knowledge, as well as information conveyed to me by other knowledgeable Postal Service personnel in the course of my official duties and responsibilities.

Election Mail

3. The Postal Service defines "Election Mail" as any item mailed to or from authorized election officials that enables citizens to participate in the voting process. This includes ballots, voter registration forms, ballot applications, polling place notifications, and similar materials. This mail qualifies as Election Mail both when it is sent to voters from election officials at the state and local levels and when it is returned by voters to those officials. This is distinct from "political mail," which is sent by political candidates, political action committees, and similar organizations in order to engage in issue advocacy or to advocate for candidates or other things, such as initiatives, that may appear on a ballot.

4. States have the responsibility and authority to administer elections. Accordingly, state legislatures or state or local officials generally determine how election materials will be made available to voters (e.g., through the mail, in-person, online), when such materials will be sent out, and how such materials will be designed. Where the mail is used, state legislatures, and sometimes election officials themselves, also choose how to design ballot envelopes. A ballot envelope's design includes its shape and size; and also includes the content, format, and layout of elements that appear on the outside of the envelope. For example, ballot envelopes typically contain some combination of the Postal Service's recommended elements (e.g., official Election Mail logo, Intelligent Mail barcode), as well as voter instructions, warnings, an oath, a signature block, and additional signature blocks for witnesses. In addition, the states determine, or leave it up to state or local election officials to decide, which class of mail to use to send mailings to voters (generally either First-Class Mail or Marketing Mail), the cut-off times to enter these mailings into the postal network (meaning the timeframes that election officials set for their own entry of Election Mail directed to voters into the mailstream), deadlines for voters to request ballots and to return completed ballots, and whether to provide any tracking for a specific mailpiece (usually via the Postal Service's Intelligent Mail barcode, or a third-party system). Likewise, the states, or in some cases the state or local election officials themselves, determine whether to prepay return postage for mail-in ballots or other Election Mail that voters must return to election officials, or whether to instead require the voters to pay for postage themselves. Regardless of whether postage is prepaid by the state/locality or affixed by the voter, all Election Mail (including completed ballots) that a voter mails to

- election officials is First-Class Mail, unless the voter or state pays for one of the Postal Service's premium services like Priority Mail or Priority Mail Express.¹
5. Every federal election cycle (including primary elections), the Postal Service conducts significant outreach to state and local election officials about how to successfully use our services should they choose to utilize the Postal Service as part of their election process. Through this outreach, we explain our services and our delivery processes; discuss our recommendations and best practices; and provide guidance on how election officials can design and send their mailings in a manner that comports with postal regulations, improves mailpiece visibility, and ensures timely and efficient processing and delivery. These outreach efforts establish points of contact between election officials and Postal Service personnel to foster ongoing coordination, and also provide repeated opportunities for the Postal Service to address questions and discuss our delivery standards, postage-payment options, mailpiece design issues, tracking and mailpiece-visibility services, and other matters regarding Election Mail.
 6. Each federal election cycle, the Postal Service mails copies of its official Election Mail kit, a comprehensive guide to official Election Mail, to thousands of election officials nationwide. In 2020, the Postal Service mailed these kits, known as Kit 600, to approximately 11,500 election officials.² The Postal Service also conducts numerous outreach meetings with election officials, sends out written communication, and recommends that election officials contact Postal Service

¹ Because ballots being sent by voters back to election officials are individual pieces (not sent in bulk), and because ballots contain personal handwritten or typewritten information, they cannot be mailed as Marketing Mail (which has volume minimums and content restrictions).

² Kit 600 is also publicly available online at: <https://about.usps.com/kits/kit600.pdf>.

mailpiece design analysts to review their Election Mail envelope designs. Also, during each election cycle, the Postal Service also assigns talented and experienced personnel to serve in temporary positions as Political and Election Mail Coordinators, who conduct outreach and serve as the primary points of contact for election officials, among other things. Many districts also have members of their staff provide part-time coordinator support, splitting duties between their normal jobs and the coordinator role. In 2020, the Postal Service has 441 Coordinators, 76 Full-Time and 365 Part-time.

7. The Postal Service's outreach efforts have intensified in 2020 with the expected increase in mail-in voting. In May, the Postal Service's General Counsel sent a guidance letter to more than 11,500 election officials and state political parties, reiterating several aspects of the Postal Service's processes and delivery standards and highlighting recommendations that would help ensure a successful election season. That May letter attached a copy of Publication 632, State and Local Election Mail – User's Guide, which provides further guidance to election officials about the Postal Service's recommendations, key considerations, and the services available to them. A copy of the May 2020 letter sent by the Postal Service's General Counsel is attached as Exhibit 1.
8. In July, the General Counsel followed that May letter with a letter to the top election official in each state and the District of Columbia, noting instances where, under the Postal Service's reading of that jurisdiction's election laws, certain state-law deadlines may be in tension with the Postal Service's existing delivery standards and recommendations. That letter repeated the Postal Service's prior recommendation that

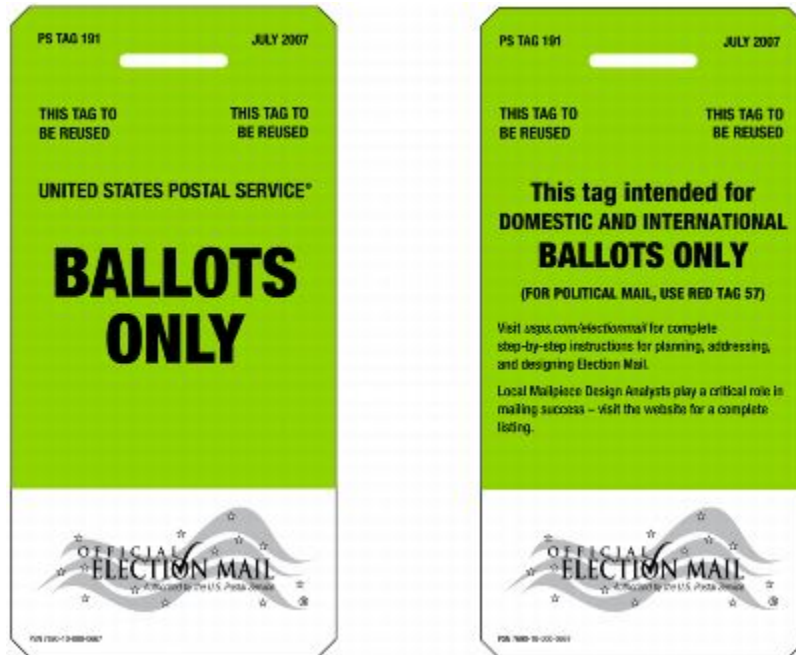
voters who choose to use the mail should request their ballots early and should mail in their completed ballots at least one week before the election. These recommendations are consistent with guidance provided by the Postal Service for past elections, including for example the 2016 Presidential Election. Attached as Exhibit 2 is a letter dated September 23, 2016, which I understand was sent to election officials in every state.

9. This year, the Postal Service has already had approximately 42,000 total touchpoints with election officials to help facilitate the smooth and orderly conduct of the 2020 election and we will continue our outreach efforts through Election Day.
10. This year, the Postal Service expanded its leadership taskforce on Election Mail to enhance our ongoing work. Leaders of our postal unions and management associations have joined this taskforce to ensure strong coordination throughout the Postal Service, with state and local partners, and to make sure any concerns can be raised and resolved at the highest levels of the organization. Because of the unprecedented demands of the 2020 election, this taskforce will help ensure that election officials and voters are well informed and fully supported by the Postal Service. In addition, on August 21, 2020, the Postal Service Board of Governors established a bipartisan Election Mail Committee to actively oversee the Postal Service's processes in support of mail-in voting. The Committee will use its oversight role to reinforce the Postal Service's strong commitment to voting by mail as an important part of the nation's democratic process and will regularly monitor execution of our work on Election Mail to ensure that our part of this election process is implemented in the most effective way possible.

11. One of the most important recommendations that the Postal Service makes to state and local election officials is to use one or more methods to distinguish Election Mail from other mailpieces, which in turn helps the Postal Service identify Election Mail flowing through the postal network so that it can be appropriately treated and expeditiously moved (as discussed further below). A primary method of distinguishing Election Mail is through the use of the Postal Service's official Election Mail logo:



12. Postal Service employees are trained to identify this logo on Election Mail. Similarly, election officials are encouraged to distinguish ballot mailings that they send to voters by affixing (or instructing their third-party vendors to affix) Green Tag 191 (image below) to containers (e.g., trays or sacks) containing ballots.



13. If Green Tag 191 is affixed to a particular tray or sack of mail when the mail is entered into the postal network, the Postal Service knows that the tray or sack contains ballots being sent to voters, and ensures that it receives the appropriate handling and processing based on our longstanding practices and policies.³ The Postal Service also recommends that election officials identify mail as Election Mail by checking a box on the postage statement form that may be used when tendering a mailing to the Postal Service.⁴ These are three of the primary methods election officials may use to identify Election Mail containing ballots for the Postal Service, if they choose to identify it; the Postal Service does not require election officials to use any of these methods. The Postal Service’s official Election Mail logo and Green Tag

³ Green Tag 191 can be used only for ballots being sent to voters, and not for any other kind of Election Mail.

⁴ A postage statement is a special form produced by the Postal Service that documents the number of pieces in the mailing and the postage price for those pieces.

191 have been in use since the 2012 election. The check box on the postage statement form was introduced in 2014 and has been in use since.

14. These identifiers help increase the visibility of Election Mail as it travels through our network, from entry to delivery. The Election Mail logo distinguishes the piece through the entire process, and the postage statement form check box and Green Tag 191 ensure that the Postal Service's employees and systems recognize a particular mailing as Election Mail when it is entered into our network. The Postal Service uses these identifiers to help ensure we are following existing processes for handling Election Mail. That practice is the same for the upcoming November election as it has been in prior ones.

Prioritization of Election Mail

15. Except where a voter chooses to purchase one of the Postal Service's premium services – Priority Mail (which has a retail price starting at \$7.50) or Priority Mail Express (which has a retail price starting at \$26.35) – completed ballots mailed by a voter to an election official are First-Class Mail, just like other single-piece mail such as holiday cards and bill payments. Such completed ballots are First-Class Mail whether they are prepaid by election officials or mailed with a stamp by the voter. States, and sometimes election officials themselves, choose whether to prepay postage on behalf of voters on ballots or not. The most common methods of prepaid postage for Election Mail are Business Reply Mail, Qualified Business Reply Mail, Metered Reply Mail, Permit Reply Mail, or stamps. If election officials choose to use Business Reply Mail or Qualified Business Reply Mail, they will only be charged for the pieces that are actually returned by voters through the mail.

16. For most U.S. citizens who live abroad but are eligible to vote in U.S. elections, their ballots mailed from foreign countries are handled as First-Class Mail once they arrive in the United States and enter the Postal Service's processing network. For general elections for Federal office, overseas uniformed services voters, including active duty military personnel and their families, may use Priority Mail Express Label 11-DOD, *DOD Express Mail Label Absentee Ballot*, to return their ballots from an Army Post Office (APO), Fleet Post Office (FPO), or Diplomatic Post Office (DPO). Where Label 11-DOD is used to return a ballot, the ballot will be treated as Priority Mail Express when it reaches the United States and enters the Postal Service's processing network. We recommend that other voters who live abroad should return their mail-in ballots as early as possible, because domestic delivery timeframes do not account for international deliveries, and foreign postal operators may have different delivery standards. Acting early is especially important this year because of exigent circumstances created by the COVID-19 pandemic. For example, regular postal service is currently still suspended with some countries. However, voters living abroad may return their ballot at any U.S. embassy, consulate, or Diplomatic Post Office (where the ballots would be included in diplomatic mail, which continues without disruption). For overseas voters who have authorized access to a military base, they may return their ballot at that U.S. military base (where the ballots would be included in APO/FPO mail, which continues without disruption).
17. This year, as in years past, election officials who use the mail to provide voters with election materials, including blank ballots, may mail such materials to voters as First-Class Mail or Marketing Mail. There are some differences between First-Class Mail

and Marketing Mail, although they are processed using the same equipment. Single Piece First-Class Mail generally is delivered within a two to five day timeframe, meaning two to five days after the mail is entered into the mailstream or collected by the Postal Service, while most Marketing Mail is delivered on a three to ten day timeframe. First-Class Mail can be transported by air when the mail needs to travel a long distance to be delivered, but Marketing Mail is moved only by ground transportation. The Postal Service provides automatic forwarding for First-Class Mail, but not Marketing Mail. First-Class Mail pieces are also sealed against inspection, whereas Marketing Mail is not. These differences between First-Class and Marketing Mail are set forth in the Mail Classification Schedule, which is maintained on the Postal Regulatory Commission's website, as well as the Domestic Mail Manual, which is a Postal Service regulation.

18. With respect to Election Mail, the differences between First-Class and Marketing Mail are relevant only to Election Mail that officials send out to voters, since (as discussed above) ballots being returned by voters are, at a minimum, First-Class Mail. The Postal Service has, for many years, recommended that election officials use First-Class Mail service for all Election Mail. If election officials choose to send out Election Mail to voters as Marketing Mail, there is no regulation or formal Postal Service policy providing that Election Mail (including ballots) entered as Marketing Mail be automatically upgraded to First-Class Mail, even if the mail bears the official Election Mail logo. To my knowledge, no such regulation or policy has ever existed.
19. The Postal Service recognizes the importance of Election Mail, however, and has policies and established practices to help prevent Election Mail – whether sent by

election officials as Marketing Mail or First-Class Mail – from being lost or delayed. For example, the Postal Service uses log sheets that account for and help track Election Mail through processing. If a county election board enters a container of Election Mail into the postal system on a particular day, that container gets logged by Postal employees at each step along the way – in the business mail entry unit, the processing facility, and the delivery unit, for example – so that the container can be tracked. The Postal Service also uses daily “all clears” to ensure that all Election Mail is accounted for within the system. In the all clear process, in-plant support personnel in processing or delivery units use a checklist to confirm that mail scheduled or “committed” to go out that day has gone out, and anything committed for the next day is at the front of the line. Personnel conducting all clears may consult the logs that were described earlier, and also check all locations within the facility (e.g., processing equipment) to ensure that all pieces of Election Mail in the facility’s possession are in the right location. Attached as Exhibit 3 is an example of an “Operational Clean Sweep Search Checklist – Political and Election Mail” that USPS personnel routinely use as part of the “all clear” procedure.

20. In terms of delivery speed, the Postal Service recognizes that Election Mail, and ballots in particular, are time-sensitive. Accordingly, while there is no formal policy, the Postal Service has several longstanding practices of prioritizing the expeditious processing and delivery of Election Mail, particularly ballots. I have knowledge of and experience with these practices both in my current role, and as a Plant Manager during the 2016 election.

21. Specifically, a longstanding practice within the Postal Service is to devote excess First-Class Mail processing capacity to Election Mail, including blank ballots sent out to voters. A plant can process a finite amount of mail per day within First-Class Mail standards. Where there is not enough First-Class Mail to fill that capacity, we fill it with other mail such as Marketing Mail. This is called “advancing.” Although there is no formal policy to this effect, it is a longstanding practice to advance Election Mail entered as Marketing Mail ahead of all other Marketing Mail. As a result of this practice, the delivery timeframes for Election Mail entered as Marketing Mail often are comparable to those of Election Mail entered as First-Class Mail. In my experience, the majority of Election Mail entered locally as Marketing Mail ultimately has a similar delivery speed to First-Class Mail because of “advancing” and other Postal Service practices.
22. Another practice is ensuring that Election Mail including blank ballots sent to voters is not left behind. If a truck leaving a facility is going to be 100 percent full, we prioritize placing the ballots on the truck.
23. In addition to those practices, Postal Service employees also often undertake extraordinary efforts to accelerate the delivery of ballots that have been mailed by election officials, whether sent using First-Class Mail or Marketing Mail service, or by voters very close to or on Election Day. There is no formal Postal Service policy discussing this practice, but it is culturally understood within the Postal Service, and, in my experience, has been part of Postal Service culture during the whole time I have been aware of the Election Mail process.

24. The decision to undertake these efforts is generally made at the local level by District and/or Plant leadership and staff. The Postal Service's Area and Headquarters leadership and officers have, to my knowledge, always approved of these efforts when informed of them. I am unaware of any opposition by management to these efforts.
25. An example of the efforts undertaken by the Postal Service's employees this year occurred when New York City mailed thousands of blank ballots to voters on the Friday before a Tuesday primary election. When the local Plant Manager and District Manager heard about this from the Postal Service's local Election Mail coordinator, they ordered our employees to undertake extraordinary efforts to ensure that as many ballots as possible reached the voters before Election Day so they could still be returned in time to be counted. After giving that order, they informed their Area Vice President, who endorsed the decision and told them to do anything they needed to do to deliver the ballots. Postal Service employees then segregated the ballots from the other mail and sent them as Priority Mail Express (formerly known as Express Mail), the Postal Service's fastest and most expensive service, so that the ballots moved as quickly as possible through our network. This was done at considerable expense to the Postal Service, which we did not seek to recover from the election officials.
26. Other extraordinary measures we have undertaken include providing additional deliveries during the day and making deliveries on Sundays. Postal personnel, including managers, will also personally deliver ballots on a same-day basis to election officials throughout Election Day, in recognition of the fact that many local election boards require that they must physically receive ballots by a certain time on

Election Day. I have personal knowledge of the fact that on previous Election Days, if a state has, for example, a 7 p.m. return deadline, postal employees have been instructed to search a facility at 5 p.m. to find every ballot they can so that it can be turned over to election officials by the state's deadline. Again, the Postal Service undertakes these extraordinary measures at its own cost, including overtime, fuel, mileage, and other similar expenses. During this election season, I am aware that we made extra deliveries over the weekend in Georgia and Washington, D.C., to ensure to the best of our ability that ballots would be delivered to voters in time to vote in primaries, despite mailings by election officials very close to Election Day.

27. I am not aware of anyone in the Postal Service who has disapproved efforts to do anything reasonably possible to deliver ballots in time for votes to be counted. To the best of my knowledge, Postmaster General DeJoy has not done anything to change these practices or expressed any intention to do so. Nor have any other members of the Postal Service's Executive Leadership Team. In sum, I am not aware of anyone within the Postal Service expressing any intention to stop, curtail, discourage, or interfere with any effort to accelerate the delivery of ballots so they may arrive in time to be counted during this year's election cycle.

28. I expect us to undertake these same extraordinary efforts during the November 2020 general election when necessary. I fully support these efforts and intend to use my position to facilitate them. In fact, this year the Postal Service has implemented additional measures to ensure the timely delivery of ballots, as discussed below.

29. For example, on August 18, 2020, Postmaster General DeJoy committed that, starting on October 1, 2020, the Postal Service will engage standby resources in all areas of

our operations, including transportation, to satisfy any unforeseen demand related to the November general election. His testimony under oath before both the Senate Homeland Security and Government Affairs Committee on August 21, 2020, and the House Committee on Oversight and Reform on August 24, 2020, confirmed this commitment. These “standby resources” will include, as needed, additional staffing, additional transportation, extra trips, and expanded mail processing windows. With respect to expanded mail processing, the Postal Service’s mail processing machines generally have, across the board, unused excess capacity (e.g., idle windows) that we can utilize as needed to ensure the timely processing of Election Mail. For example, on average, Advanced Facer Cancellor Systems (AFCS), which cancel (apply postmarks) to letter-sized mail, run less than 8 hours per day (outside of the Peak holiday season in December). Operations officers throughout the Postal Service will deploy these standby resources as needed.

30. There are practical limitations to what these extraordinary efforts can accomplish. If a ballot is mailed from the West coast to the East coast on Election Day, it will be impossible for the Postal Service to deliver it on the same day. There are also limitations of scale. It may be possible for us to provide same-day delivery for 5,000 ballots through extraordinary delivery measures, but, as the number increases to 50,000 or beyond, such special measures become much more difficult.
31. Because of the anticipated increase in voting using the mail due to COVID-19, and the inexperience of many state and local election officials in administering an election with such a high volume of mail-in ballots, there is a high risk that large mailings may be entered close to or on Election Day, as we have already experienced during

some primary elections this year. Such occurrences may strongly test what is realistically possible regarding accelerated delivery times, even with heroic efforts from the Postal Service.

32. To help educate election officials about how the mail works and what they can expect when using the mail as part of their elections, and as part of our commitment to delivering Election Mail in a timely manner, in addition to publishing comprehensive guidance materials on our website (usps.com/votinginfo), we regularly communicate with election officials by letter, phone, meetings, and otherwise to educate them on our processes, procedures, and recommended best practices, including recommended mailing timeframes, using First-Class Mail, and using available labeling tools to increase visibility and tracking for Election Mail. This communication strategy has not changed since Postmaster General DeJoy took office. However, this year, the frequency of communications between the Postal Service and election officials has increased, because of the need to address challenges stemming from the COVID-19 pandemic.

Ballot Cancellation

33. A postmark is an official Postal Service imprint applied on the address side of a stamped mailpiece. A postmark indicates the location and date the Postal Service accepted custody of a mailpiece, and its primary purpose is to cancel affixed postage so that it may not be reused (thereby providing some revenue assurance for the Postal Service). Cancellation is not required for mailpieces that bear a permit, meter, precancelled stamp for postage, or for pieces with an indicia applied by various postage evidencing systems, because this type of postage is not at risk of being

reused. As such, the Postal Service's mail processing system is not designed to cancel every single mailpiece that flows through the system.

34. It has, however, been the Postal Service's policy for several years to "cancel" (commonly understood by the public as "postmark") all ballots returned by voters, regardless of the method of payment used; this policy remains in place. For example, if a mailpiece comes in that is permitted or metered and, if it is identifiable as a ballot, the Postal Service will still try to "cancel" or "postmark" that mailpiece. This policy is in recognition of the importance that many states place on a postmark, as a means of validating that the ballot was returned on time.
35. Letter-sized mail is typically cancelled using an AFCS machine at a plant. Based on my own knowledge of the Postal Service's inventory of AFCS machines, including removals prior to Postmaster DeJoy's August 18, 2020 direction to suspend such activity, and the processing capacity of those machines, the Postal Service has sufficient AFCS capacity to handle all ballots during this year's election. In general, most processing plants run AFCS machines only from 4 p.m. to about 11 p.m., meaning that these machines typically have many extra hours of processing capacity that can be used, for example, to cancel ballots.
36. During the Postal Service's regular operations, some mail bypasses the cancellation machine, like trays of prepaid (usually metered) mail. Even for mail that runs on the cancellation machine, there are some mailpieces that the machine cannot read or apply a cancellation mark to, for instance if the piece is overly wet or crumpled. Those mailpieces enter the "reject" or "return" processing flows. The "reject" or "return" mail is ordinarily moved through processing without applying a cancellation

mark. However, during election season, if a cancellation machine rejects a mailpiece, and that mailpiece is identifiable as a ballot, then the ballot is cancelled by hand before continuing through processing. In addition, as discussed further below, the Postal Service recently began using dedicated ballot monitors to ensure that all ballots are, to the extent possible, being identified and cancelled, either by machine or by hand.

37. There are limited instances where the Postal Service may not be able to attempt “postmarking” or “cancellation” on a ballot. For example, many businesses and other bulk mailers send mail in bulk-mailing trays containing roughly 400 pieces each. These trays often consist primarily of metered mail, which does not require cancellation. As such, these trays of metered mail generally bypass the cancellation machines and are entered directly into sorting machines. This means a ballot mailed from an office or similar location that has primarily metered outgoing mail that is entered into the mailstream in trays would not receive a cancellation unless a Postal Service employee recognized the ballot within the tray and separated it for cancellation.
38. There are other reasons a ballot might not receive a legible cancellation mark. For example, occasionally two pieces may be stuck together when they are run through the machine, or the ink in a given cancellation machine may smear.
39. In order to minimize these issues, the Postal Service has modified its regular processes to maximize the likelihood that a ballot is cancelled. These measures include making extra efforts to hand cancel ballots that are rejected by automated cancellation machines and training Postal Service employees to recognize ballots

using the official Election Mail logo to make sure that these mailpieces are cancelled.

This year, for the first time of which I am aware, the Postal Service also began utilizing ballot monitors in every processing facility to monitor the postmarking process and ensure all processes are being adhered to properly with a goal to minimize any missed postmarks on ballots. For the week before the November general election and through Election Day, each facility will have a ballot monitor who is fully familiar with processing operations and the procedures that should be followed for cancelling ballots.

40. In order to successfully implement the ballot postmarking processes, Postal Service employees must recognize a mailpiece as a ballot. To help Postal Service employees recognize ballots in the mailstream, the Postal Service has recommended (and recommends again this year) that election officials include the official Election Mail logo on the ballot envelope, as well as other identifiers discussed above. Because return ballots can be mailed from anywhere in the country, the use of the universally recognized official Election Mail logo is particularly important for visibility. A Postal Service employee may not be familiar with the appearance of a ballot for King County, Washington, for example, but would recognize the official Election Mail logo. Election officials are not required to include these identifiers, but, without them, it is significantly more difficult for the Postal Service to identify and cancel ballots.
41. In this election cycle, the Postal Service has intensified its efforts to improve the postmarking process by convening a Postmark Team that has worked to identify and correct potential process deficiencies, and has updated Processing Operations Management Orders, Stand Up Talks, and Standard Work Instructions. This team also

recommended the use of ballot monitors, who have been used successfully in several of the later primary elections in 2020 and will be in place for the November general election.

Ability of the Postal Service to process Election Mail

42. The Postal Service typically delivers well over 400 million mailpieces per day. In 2019, the Postal Service delivered an average of 472 million mailpieces per delivery day. Even if every registered voter in the United States were to vote by mail this year (which, based on available data, would total around 155 million mailed-in ballots), their ballots would represent only a tiny portion of the total mail volume that the Postal Service handles. Currently, even with the anticipated increase in the use of voting by mail, the Postal Service is projecting that only two to five percent of total volume in October and November will be Election Mail. However, to help ensure that all Election Mail can be delivered on time, and to mitigate the impacts of any surges in Election Mail sent in the days immediately before Election Day, the Postal Service is actively encouraging voters and election officials to act early to allow enough time for voters to request, receive, complete, and return their ballots.
43. There will be surges in Election Mail volume near the November general election date, but we experience these types of mail surges regularly for things such as monthly billing cycles, holidays, and the 2020 Census, and we are prepared for them. We expect less total volume during the entire election season of October to November than during the peak mailing season, which begins after Thanksgiving and extends into early January. Peak in 2019 was projected to have around 13 billion mailpieces. During the peak week of the holiday season, the Postal Service expected

2.5 billion pieces of First-Class Mail, not counting any Marketing Mail. If every registered voter was to receive an application for a mail-in ballot and return it via mail, then receive a mail-in ballot and also return it by mail, the total volume handled by the Postal Service for all four legs in this scenario would total around 640 million pieces, which is roughly 25 percent less than the peak seven days handled by the Postal Service. The Postal Service's routine, data-based reductions in the number of sorting machines in facilities, and other reductions in equipment, are done conservatively, with anticipated surges in mind and accounted for. In my time as a Plant Manager, equipment was removed routinely due to declining mail volume, and I am not aware of any policy change or change to this practice this year, other than the recent pause to the practice ordered by Postmaster General DeJoy until the November election is over.

44. While the COVID-19 pandemic presents challenges for the Postal Service due to decreased availability of Postal Service workers, we have worked with the Postal Service's unions to bring on additional workers and are confident that we will have the workforce we need. We have plans in place to respond to the continued negative impact of COVID-19 and are making plans to rapidly respond to crises that may occur, including spikes in COVID-19-related absences.
45. The Postal Service's most significant concerns with respect to this election are envelope design, including ballot envelope design, because poorly designed envelopes can impact processing and cause improper delivery; and the state's mailing timeframes or deadlines, particularly those deadlines and timeframes that may have changed or be changed near Election Day in light of circumstances resulting from the

COVID-19 pandemic. These concerns have driven our expanded efforts this year to reach out to and educate election officials, in order to ensure a smooth mail-in voting process.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed at Washington, DC on this 8 day of September, 2020



Robert Justin Glass